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14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN JOSE DIVISION

17 IN RE SEAGATE TECHNOLOGY LLC
LITIGATION

No. 5:16-cv-00523-RMW

18
19 CONSOLIDATED ACTION

[PROPOSED] ORDER APPOINTING
INTERIM CO-LEAD COUNSEL

1 On May 13, 2016, Plaintiffs filed a motion for the appointment of Hagens Berman Sobol
2 Shapiro LLP (“Hagens Berman”) and Axler Goldich LLC (“Axler Goldich”) as interim co-lead
3 counsel for Plaintiffs and the proposed class.

4 **I. APPOINTMENT OF INTERIM CO-LEAD COUNSEL**

5 The Court has considered the Plaintiffs’ motion, together with the Memorandum of Law and
6 Declaration of Steve W. Berman filed together therewith, and finds that the designation of Hagens
7 Berman and Axler Goldich as interim co-lead class counsel is in the best interests of the proposed
8 class because those firms:

- 9 (1) have conducted significant independent investigations into the potential claims in this
10 action;
11 (2) have extensive relevant experience in complex litigation and class action lawsuits,
12 including consumer class actions, and have knowledge of the law applicable to this
13 action; and
14 (3) are willing and able to commit the resources necessary to representing the Plaintiffs
15 and proposed class.

16 **II. DUTIES OF INTERIM CLASS COUNSEL**

17 Interim co-lead counsel, working together in a coordinated fashion, shall be responsible for
18 the overall conduct of the litigation on behalf of the Plaintiffs and the proposed class, including the
19 following:

- 20 a. Supervise all pretrial, trial, and post-trial proceedings on behalf of Plaintiffs and the
21 proposed class;
22 b. Sign any pleadings, motions, briefs, discovery requests or objections, subpoenas or
23 notices on behalf of Plaintiffs and the proposed class;
24 c. Determine and present in motions, briefs, oral argument or such other fashion as may
25 be appropriate, the position of the Plaintiffs and the proposed class as to all matters
26 arising during pretrial and trial proceedings;
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- d. Designate attorneys to act as spokespersons at pretrial conferences and meetings with the defendant;
- e. Negotiate and enter stipulations with defense counsel with respect to all matters in this litigation, including discovery and settlement matters;
- f. Conduct or coordinate discovery on behalf of Plaintiffs and the proposed class, including the preparation of interrogatories, requests for production of documents, requests for admissions, and the examination of witnesses in depositions;
- g. Coordinate the activities of Plaintiffs' counsel and implement procedures to ensure that schedules are met and unnecessary expenditures of time and funds are avoided;
- h. Collect time and expense reports from counsel for the Plaintiffs on a periodic basis;
- i. Employ and consult with experts;
- j. Convene meetings of counsel;
- k. Delegate tasks and otherwise coordinate the work of Plaintiffs' counsel, and perform such other duties as the co-lead interim class counsel deem necessary;
- l. Allocate fees, if any are awarded by the Court; and
- m. Ensure that all Plaintiffs' counsel are kept informed of the progress of this litigation as necessary.

Therefore, the Plaintiffs' Motion is GRANTED.

IT IS SO ORDERED.

DATED: _____

HONORABLE RONALD M. WHYTE

UNITED STATES SENIOR DISTRICT
COURT JUDGE